

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20054

In the Matter of )  
 )  
 Amendment of the Commission's Rules ) RM-8499  
 to Establish a New Radio Service )

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**Comments of the Mobile and Personal Communications Division,  
 Private Radio Section of the Telecommunications Industry Association**

To the Commission:

The Mobile and Personal Communications Division, Private Radio Section of the Telecommunications Industry Association ("TIA") submits these comments in support of the Petition for Rule Making filed by the Radio Shack Division of Tandy Corporation ("Tandy") concerning the creation of a new personal radio service called the "Family Radio Service" that would be authorized under Part 95 of the FCC's rules.<sup>1</sup> This Section of the TIA supports the creation of a new consumer radio service utilizing channels interstitial to regularly assignable channels in the General Mobile Radio Service ("GMRS") and thus urges the FCC to commence a rule making proceeding seeking to achieve this objective.

TIA members believe that there is a potentially strong market for low-cost, two-way radios that provide improved communications quality and functionality over that currently offered by the Citizens Band Radio Service ("CB"). Manufacturers foresee a service that offers low-power, palm-sized radios utilizing selective calling techniques

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<sup>1</sup> The Private Radio Section of TIA's Mobile and Personal Communications Division is comprised primarily of manufacturers of private land mobile radio equipment for non-carrier based services.

for private two-way communications. As mentioned in the Tandy Petition, the potential applications and users of this service are varied: parents keeping in contact with children, local watch patrols monitoring neighborhood activities, small businesses improving their efficiency through radio, and outdoor recreationists enhancing the enjoyment of their activity while increasing their safety as well.

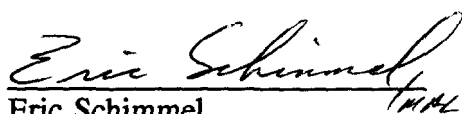
If the service is to reach a large segment of the consumer market, it must offer cost-effective equipment without recurring charges or fees. For this reason, TIA supports the proposal that this service be offered on an unlicensed basis similar to the CB service and the radio control service. Subjecting these devices to the FCC's existing licensing policies will impose substantial costs to either the manufacturers or to consumers that could threaten the viability of the proposed service. Also, considering the probability that individuals would use these devices in an itinerant fashion, little coordination benefit would be accrued through the licensing process. TIA believes that it is within the FCC's statutory authority to consider this service as a new citizens band service and exempt it from the requirement for individual user licenses.

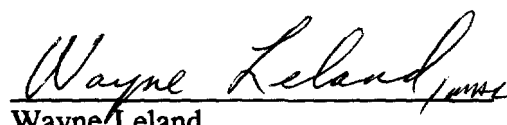
With regard to technical standards, TIA intends to fully participate in this proceeding and will provide further comments on the appropriate technical rules for devices operating in the specific proposed environment. At the outset, TIA supports the use of the GMRS interstitial channels for this purpose and is confident that technical standards can be crafted to adequately protect GMRS receivers. This proposed environment would not be markedly different from the use of the 450 MHz

offset channels in the Private Land Mobile Services for low power (i.e., 2 watts) operations.

In conclusion, TIA strongly supports the above-referenced petition for rule making filed by the Tandy Corporation and urges the FCC to propose rules creating a new Family Radio Service for two-way, short-range communications. The proposed service will serve the American public with a new cost-effective functionality while providing an exportable product that can further U.S. leadership in radio communications around the world.

Respectfully submitted,

  
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August 25, 1994

CERTIFICATE OF SERVICE


I hereby certify that this 25th day of August, 1994, I caused copies of the foregoing "Comments of the Mobile and Personal Communications Private Radio Section of the Telecommunications Industry Association" to be mailed via first-class postage prepaid mail to the following:

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